

Sent via email

From: Yvonne Nelson
To: <ejjustice@cdpr.ca.gov>
Date: Fri, May 30, 2003 1:21 PM
Subject: Comments on CDPR's Env. Justice Imp. Plan

Dear California Dept. of Pesticide Regulation,

I just read your Environmental Justice Implementation Plan, and its proposed measures are, on the whole, welcome to my ears. I do have some strong recommendations, however.

Historically, the nature of pesticide regulation was in part shaped by scientific studies that had generally extrapolated their data from observed effects on animals to a specific kind of human being: average adult male in good health. Consequently, built into the regulation is already a tendency that optimizes protections for healthy males, but does not take into account the impact on more vulnerable segments of the population.

It is well established that many medical conditions affect the sexes differently. Asthma, for example, affects boys at a rate that is about twice that for girls. However, this trend switches in adulthood when the occurrence of asthma in women exceeds that in men.

In my opinion, it is especially in the area of gender that discrimination is expressed. Historically, women have had to more often withstand hearing their physical complaints be attributed to emotional, as opposed to, physiological reasons: depression, hysteria, etc.

So for these reasons, I urge that the term "gender" be included in all of those places in the document where races, cultures and income levels are mentioned.

Secondly, I would hope that express consideration of special environmental justice protections be extended in terms of age and infirmity, since more recent studies have been showing that pesticides have a greater impact on the infirm, the developing young and the elderly.

For example, if the State of California decides to consider ground or aerial spraying of conventional pesticides to combat the spread of the West Nile Virus, it will be of utmost importance that sensitive and/or vulnerable persons have an honest and effective forum where they can state their needs. And if the State decides it will spray, such persons should be afforded necessary protections, such as relocation cost reimbursement. That would constitute environmental justice at its essence.

Thirdly, I have some specific wording changes:

* Page 3, under ³Specific Actions² heading, 1st bullet: change ³Encourage² to ³Require.²

* Same section, 5th bullet: change ³Consider environmental justice² to ³Make environmental justice of prime importance.²

Thank you for considering my recommendations.

Sincerely,
Yvonne Nelson

CC: <senator.bowen@sen.ca.gov>, <Assemblymember.Nakano@assembly.ca.gov>